

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
DANVILLE DIVISION

UNITED STATES OF AMERICA     )  
  )  
V.   ) Cr. No. 4:18-CR-00011-01  
  )  
MARCUS JAY DAVIS,                         )  
                    Defendant.                         )

**OBJECTIONS OF MARCUS DAVIS TO GOVERNMENT'S  
EXHIBITS**

In the Court's Scheduling Order, the Defendants are required to file by August 2, 2019, any objections to the authenticity, foundation, and completeness of the Government's exhibits. Thus, this pleading does not address Mr. Davis's objections on other bases including but not limited to hearsay, relevance, undue prejudice, and violations of the Confrontation Clause of the Sixth Amendment, which objections, if any, will be addressed in Motions in Limine due at a later date.

Regarding objections to completeness, Mr. Davis notes that the Government's exhibits include several video statements, transcripts, and

proffer notes of various witnesses. Often these statements and/or recordings are redacted such that only particular clips are included. Under Rule 106 of the Federal Rules of Evidence and the common law rule of completeness, Mr. Davis objects to any partial document, statement or recording being introduced without the introduction of the entire document, statement or recording. *Beech Aircraft Corp. v. Rainey*, 488 U.S. 153 (1988); Fed. R. Evid. 106.

Respectfully submitted,  
Marcus Jay Davis

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### CERTIFICATE OF SERVICE

I hereby certify that this 2<sup>nd</sup> day of August, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record including the following:

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